

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-27 are pending in this application. Claims 1, 13, 14, and 25-27 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 14.

Claim Amendments

Independent claims 1, 13, 14, and 25-27 have been amended to clarify that the “usage pattern specifies a plurality of persistent objects and an attribute for each of the plurality of persistent objects for a web page, wherein the attribute corresponds to content associated with the web page that is requested by the client runtime, and wherein the plurality of objects is organized as an object graph.” Support for this amendment may be found, for example, on paragraphs [0021] – [0024] of the instant specification. Dependent claims 2, 11, 15, and 23 have been amended to address the antecedent basis issues arising from the amendments made to the aforementioned independent claims. No new matter has been added by any of the aforementioned amendments.

Applicant’s Response to “Response to Arguments” Section

The Examiner has asserted that the “name and source/URL” listed in the “needs list” as taught by Pirolli correspond to attributes listed in the usage specification. (See Office Action mailed August 10, 2005, p. 19). The Applicant respectfully disagrees. At the outset, the Applicant notes that it is unclear as to how a reference that does not even mention the term

“persistent object” (or refer to the concept of persistence as it relates to objects) can be held to teach a “persistent object.”

Further, the Applicant asserts that the “needs list” taught by Pirolli does not include attributes as recited in the amended claims. Specifically, Pirolli teaches storing the name and source/URL information of a document on the needs lists as well as a pointer to other data associated with the document (*See* Pirolli, col. 6). However, neither the information stored in the needs list nor the information referenced by the needs list (*e.g.*, the content data) corresponds to content associated with the web page that is requested by the client runtime, as recited in the claim.

Specifically, the attributes recited in the amended claims correspond to specific attributes within the persistent objects listed in the usage specification. The purpose of specifying attributes is to minimize the amount of data sent across the network, by only sending the attributes (within the persistent objects) that are needed for a particular web page. Thus, only the required attributes of the persistent object, as opposed to all the attributes of the persistent object, are communicated over the network. In contrast, the information maintained in the needs lists taught by Pirolli at best, may be used to locate and rank the particular document in the needs list.

In view of the above, the Applicant respectfully asserts that Pirolli does not teach a usage specification as recited in the amended claims.

Rejection(s) under 35 U.S.C. §103

Claims 1, 2, 4-10, 13-22, and 25-27 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,321,240 (“Chilimbi”) in view of U.S. Patent No. 6,098,064 (“Pirolli”). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness "...the prior art reference (or references when combined) must teach or suggest all the claim limitations." (See MPEP §2143.03). Further, "all words in a claim must be considered in judging the patentability of that claim against the prior art." (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of independent claims 1, 13, 14, and 25-27.

Specifically, the Examiner has admitted that Chilimbi does not teach "determining a usage pattern of the system using gathered information" (See Office Action mailed August 10, 2005, p. 3).

Moreover, the Applicant respectfully asserts that Pirolli does not teach that which Chilimbi lacks. In particular, Pirolli is directed to a system that includes a mechanism to record information about a document when the document is initially fetched and then to use this information to determine whether to prefetch and cache the document in the future (See Pirolli, FIG. 5-FIG. 8). As discussed above, while Pirolli discusses determining whether to prefetch and cache particular documents, Pirolli does not teach or suggest (i) creating a usage pattern; or (ii) gathering information that may be used to determine a usage pattern, as recited in the amended claims. Moreover, Pirolli is completely silent with respect to organizing the plurality of objects for a given web page in the usage specification, into an object graph.

In view of the above, Chilimbi and Pirolli, whether viewed separately or in combination, fail to teach or suggest the invention recited in amended independent claim 1. Thus, amended independent claim 1 is patentable over Chilimbi and Pirolli. Further, amended independent claims 13, 14, and 25-27 are also patentable for at least the same reason as amended independent claim 1. In addition, dependent claims (amended and original) are also patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 3 stands rejected under 35 U.S.C. § 103 as being obvious over Chilimbi and Pirolli in view of U.S. Patent 6,700,590 (“DeMesa”). As noted above, independent claim 1, from which claim 3 depends, has been amended. Thus, to the extent that this rejection still applies, this rejection is respectfully traversed.

As discussed above, Chilimbi and Pirolli do not teach or suggest all the limitations recited in amended independent claim 1. Further, the Applicant respectfully asserts that DeMesa does not teach that which Chilimbi and Pirolli lack. This is evidenced by the fact that DeMesa is only relied upon to teach “generating a business description model.” (*See* Office Action mailed August 10, 2005, p. 16). Thus, amended independent claim 1 is patentable over Chilimbi, Pirolli, and DeMesa. Further, dependent claim 4 is also patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 11, 12, 23, and 24 stand rejected under 35 U.S.C. § 103 as being obvious over Chilimbi and Pirolli in view of U.S. Patent 6,430,741 (“Mattson”). As noted above, independent claim 1, from which claims 11 and 12 depend, has been amended. Further, independent claim 14, from which claims 22 and 23 depend, has been amended. Thus, to the extent that this rejection still applies, this rejection is respectfully traversed.

As discussed above, Chilimbi and Pirolli do not teach or suggest all the limitations recited in amended independent claims 1 and 14. Further, the Applicant respectfully asserts that Mattson does not teach that which Chilimbi and Pirolli lack. This is evidenced by the fact that Mattson is only relied upon to teach “generating documentation from the usage pattern” and “displaying the usage pattern to a display device.” (*See* Office Action mailed August 10, 2005, p. 13). Thus, amended independent claims 1 and 14 are patentable over Chilimbi, Pirolli, and Mattson. Further, dependent claims 11, 12, 23, and 24 are also patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

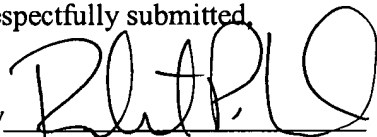
Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 16159/022001; P6423).

Dated: November 10, 2005

Respectfully submitted,

By

A handwritten signature in black ink, appearing to read 'R. P. Lord', written over a horizontal line.

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